

## **REMARKS**

Applicant is in receipt of the Office Action of September 8, 2006. Claims 1 – 25 were rejected. Claims 17 – 25 have been amended. Claims 1 – 25 remain pending in the application.

### **Objection to the Drawings**

Figure 1 was objected to for lacking a text description. Applicant has amended Figure 1 to add text. Withdrawal of the objection is respectfully requested.

### **Rejections Under 35 U.S.C. § 101**

Claims 17 – 25 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicant has amended claims 17 – 25 to recite, in pertinent part, computer-readable storage media. Support for the amendments may be found in the specification at least at page 14, lines 17 – 19. Applicant respectfully requests withdrawal of the § 101 rejections.

### **Rejections Under 35 U.S.C. § 103(a)**

Claims 1 – 25 were rejected under 35 U.S.C. § 103(a) as being anticipated by Shandony (U.S. Patent No. 6,675,261) in view of Mangat et al. (U.S. Patent No. 6,049,799), hereinafter “Mangat.” Applicant respectfully traverses the rejections in light of the following remarks.

Claim 1 recites, in pertinent part:

1. A method comprising:

populating a directory with entries for each of a plurality of users of a multi-user computing environment, wherein each entry in the directory comprises a user ID and one or more group names, wherein each of the one or more group names corresponds to a group to which the user ID belongs, and wherein at least one of the entries in the directory comprises a first group name of the one or more group names;

determining a first group access control list for the first group name, wherein the first group access control list comprises the user IDs of users whose entries comprise the first group name, and wherein the first group access control list is stored outside of the directory; for each data source in the multi-user computing environment which permits access by the first group name, granting access to the respective data source to the users in the first group access control list.

To establish a *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP 2143.03. Applicant respectfully submits that the cited references, taken individually or in combination, do not teach or suggest all the limitations recited in the claims.

In regard to claim 1, Applicant respectfully submits that the cited references, taken individually or in combination, do not teach or suggest the limitations “wherein the first group access control list comprises the user IDs of users whose entries comprise the first group name, and wherein the first group access control list is stored outside of the directory.” The Office Action contends that Mangat teaches or suggests these limitations (in particular, at Figure 5; col. 2, lines 14-28; and col. 16, lines 40-52). Applicant respectfully disagrees.

Mangat discloses a method and apparatus for maintaining, updating, finding, and re-making links between documents and consumers of those documents. At the specific locations cited in the Office Action, Mangat discloses a data structure created and maintained outside a directory services system for storing information about the documents. However, Mangat does not teach or suggest an access control list stored outside of the directory. To the contrary, Mangat teaches away from Applicant’s claimed invention by disclosing a membership list (124), association lists (118, 136), and access rights (116, 122, 134) stored within the directory services server (60) (see, e.g., Figures 2-5). Therefore, Mangat does not teach or suggest “wherein the first group access control list comprises the user IDs of users whose entries comprise the first group name, and

wherein the first group access control list is stored outside of the directory” as recited in claim 1.

As held by the U.S. Court of Appeals for the Federal Circuit in *Ecolochem Inc. v. Southern California Edison Co.*, an obviousness claim that lacks evidence of a suggestion or motivation for one of skill in the art to combine prior art references to produce the claimed invention is defective as hindsight analysis. In addition, the showing of a suggestion, teaching, or motivation to combine prior teachings “must be clear and particular .... Broad conclusory statements regarding the teaching of multiple references, standing alone, are not ‘evidence’.” *In re Dembicza*k, 175 F.3d 994, 50 USPQ2d 1614 (Fed. Cir. 1999). Applicant respectfully submits that there is no evidence of a suggestion or motivation for one of skill in the art to combine Shandony and Mangat to produce the claimed invention. Furthermore, for at least the reasons discussed above, Applicant respectfully submits that the combination of Shandony and Mangat would not produce all the limitations recited in claim 1. Accordingly, claim 1 is patentably distinct from the cited references.

For at least the reasons discussed above, Applicant respectfully submits that independent claims 1, 10, and 17 are patentably distinct from the cited references. The remaining dependent claims provide additional limitations and are therefore thought allowable for at least the same reasons.

For example, Applicant respectfully submits that neither Shandony nor Mangat teaches or suggests the limitations recited in claim 3. Although Shandony discloses a policy URL (Uniform Resource Locator) obtained from a directory entry (see, e.g., Figure 69 and col. 70, line 60 to col. 71, line 47), and although a URL may include a hostname, Shandony does not teach or suggest “for each data source in the multi-user computing environment which permits access by the first hostname, granting access to the data source to the one or more users whose directory entries comprise the first hostname and who are seeking access from the host having the first hostname” as recited in claim 3 (emphasis added). Claims 12 and 19 are thought allowable for at least the same reasons.

Therefore, for at least the reasons discussed above, Applicant submits that claims 1 – 25 are in condition for allowance. Applicant respectfully requests withdrawal of the § 103(a) rejections.

## **CONCLUSION**

In light of the foregoing amendments and remarks, Applicants submit that all pending claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. If a phone interview would speed allowance of any pending claims, such is requested at the Examiner's convenience.

The Commissioner is authorized to charge any fees which may be required, or credit any overpayment, to Meyertons, Hood, Kivlin, Kowert & Goetzel PC Deposit Account No. 50-1505/5181-82200/BNK.

Also enclosed herewith are the following items:

- Return Receipt Postcard
- Attachments

Respectfully submitted,



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